

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

BRADLEY CADDELL, *et al.*,

Plaintiffs,

vs.

BRAD LIVINGSTON, *et al.*,

Defendants.

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CIVIL ACTION NO. 4:14-CV-03323

Joint Motion to Stay Discovery and Other Matters

The Parties jointly file this motion stay discovery and all other matters for **seventy-five (75) days**. The parties have reached a preliminary settlement agreement for this case and the related cases pending before the Court. The preliminary settlement is subject to multiple levels of approval, including approval from the Attorney General, the Governor, the Comptroller, and others. The parties anticipate that the settlements will be approved following completion of the process. The parties request that deadlines be extended and discovery stayed so that they may work through the settlement process.

The Parties respectfully request all proceedings and discovery in this case be stayed and deadlines extended for seventy-five days. As settlements become final in this and the related cases, the parties will notify the Court and will file a motion to dismiss the case. Within seventy-five days, the parties will notify the Court of the status of any remaining cases in which the settlement process is not complete. There are currently no deadlines falling within the next seventy-five days in this case.

Respectfully submitted,

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/s/ Leah O'Leary

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NOTICE OF ELECTRONIC FILING

I, **LEAH O'LEARY**, Assistant Attorney General of Texas, do hereby certify that I have electronically submitted for filing, a correct copy of the foregoing in accordance with the Electronic Case Files System of the Southern District of Texas, on February 7, 2018.

/s/ Leah O'Leary

Assistant Attorney General

CERTIFICATE OF SERVICE

I, **LEAH O'LEARY**, Assistant Attorney General of Texas, do hereby certify that a true and correct copy of the above and foregoing has been served by electronic service on this 7th of February, 2018 addressed to all attorneys of record.

/s/ Leah O'Leary
Assistant Attorney General